

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792.0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

**Via Electronic Filing**

The Honorable Vera M. Scanlon, U.S.M.J.  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Taveras v. Value Service & Repair Corp. et al*  
Case No.: 1:22-cv-03416-HG-VMS

Dear Honorable Magistrate Judge Scanlon:

This law firm represents Plaintiff Tristan Taveras (the “Plaintiff”) in the above-referenced action.

Pursuant to Your Honor’s directives in Your Honor’s March 24, 2023 Order, this letter respectfully serves to provide the Court with a status update in the above-referenced action.

Counsel for Defendants Steven Bach, Susan Bach, Value Service & Repair Corp., Value Service Corp., Yuval, Inc. (collectively, the “Defendants”) anticipates disclosing certain payroll and/or timekeeping requires in advance of the mediation. To that end, the parties are waiting for the Court to so-order the proposed protective order filed on February 10, 2023 [Dckt. No. 28], before scheduling a mediation with mediator Roger Briton.

Thus, the parties have not yet scheduled a date for the virtual mediation session.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Plaintiff*

VIA ECF: All Counsel